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Attorneys for Plaintiff KATHLEEN HANNI.
Individually and on behalf of all others similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

KATHLEEN HANNI, individually and on) behalf of all others similarly situated,) Plaintiff,) v.) AMERICAN AIRLINES, INC.; and DOES 1) through 20, inclusive,) Defendants.)	No. C08-00732 CW NOTICE OF MOTION AND MOTION TO REMAND Date: April 24, 2008 Time: 2:00 p.m. Courtroom: 2
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PLEASE TAKE NOTICE that on April 24th, 2008, at 2:00 p.m. in the courtroom of the Honorable Claudia Wilken at the United States Courthouse located at 1301 Clay Street, Oakland, California, plaintiff Kathleen Hanni, will and hereby does move pursuant to 28 U.S.C. 1447 for an order remanding this action to the Superior Court, Napa County, California, with actual costs including attorney fees pursuant to 28 USC 1447(c), or in the alternative, for an order requiring Defendant to turn over to Plaintiff's counsel the names, addresses and telephone numbers of its passengers that were

1 subject to diversions and delays from Dallas Forth Worth airports on December 29th, 2006, and for
2 such other relief as the Court deems just and proper in the circumstances.

3 The ground for this motion is that United States District Court lacks jurisdiction as
4 claimed by Defendant, American Airlines, Inc., through its attorney, Jie-Ming Chou, in a Notice of
5 Removal dated January 31, 2008, removing this action from the Superior Court of Napa County
6 California by alleging original federal jurisdiction based on the Class Action Fairness Act of 2005, 28
7 U.S.C. Section 1332(d) and Diversity of Citizenship and Supplemental Jurisdiction under 28 U.S.C.
8 Sections 1332(a)(1), 1367(a) and 1441(a).

9 This motion is based on this Notice of Motion and Motion, the accompanying
10 Memorandum of Points and Authorities, the Declarations of Kathleen Hanni and Paul S. Hudson, the
11 (Proposed) Order filed herewith, and upon other such matters as may be presented to this Court.

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13 Dated: February 29, 2008

LAW OFFICES OF DAVID G. RAMOS
LAW OFFICES OF PAUL S. HUDSON PC

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15 By: _____
David G. Ramos

16 Attorneys for Plaintiff KATHLEEN HANNI
17 Individually and on behalf of all others
18 Similarly situated
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